

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OKLAHOMA**

“JENNY”, “JANE”, “FIONA”, ”ERIN”, )  
“AMY”, “JESSICA”, “ANNA”, )  
“TAYLOR”, “LILY”, “SARAH”, )  
“HENLEY”, “JANE DOE” as conservator for )  
“SAVANNAH” a protected person, and for “SKYLAR” ) Case No. 4:23-cv-00474-JDR-SH  
a minor, “JOHN DOE” as conservator for “SALLY”, )  
a minor, “MAUREEN”, “VIOLET”, “PIA”, and )  
“MYA”, )  
Plaintiffs, )  
v. )  
 )  
JEFFREY RAHN REETZ, )  
 )  
Defendant. )

**MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFFS**

COMES NOW, Attorney James R. Marsh, attorney for Plaintiffs, hereby moves the Court for an Order allowing him to withdraw as counsel of record for all Plaintiffs in the above captioned matter pursuant to Local Rule LGnR4-4(b). In support of his Motion, James R. Marsh states as follows:

1. On April 18, 2024, Plaintiffs Jenny, Jane, Fiona, Erin, Amy, Jessica, Anna, Taylor, Lily, and Violet filed a motion to dismiss without prejudice pursuant to F.R.C.P. Rule 41(a)(2). (Dkt. No. 27). This motion was not opposed by Defendant Jeffrey Reetz, who appears *pro se* in this matter.
2. On May 8, 2024, this Court granted Plaintiffs’ motion to dismiss without prejudice, terminating the foregoing Plaintiffs from this case. (Dkt. No. 29).
3. The remaining Plaintiffs in this case are Sarah; Henley; Jane Doe as conservator for Savannah, a protected person and for Skylar, a minor; John Doe as conservator for Sally, a

minor; Maureen; Pia; and Mya. Each of the remaining Plaintiffs will continue to be represented in this matter by Laurie Koller of Koller Trial Law and Carol L. Hepburn of Carol L. Hepburn, P.S. (See Dkt. No. 32).

4. Given that the remaining Plaintiffs have counsel (who have both filed notices of appearances in this matter) (Dkt. 3, 32) and no longer need the undersigned's advice and counsel, the case will not be disrupted by the withdrawal sought herein. *Sanders v. Sw. Bell Tel., L.P.*, No. 03-CV-0452-CVE-FHM, 2009 WL 1765981, at \*2 (N.D. Okla. June 16, 2009) ("[g]enerally, district courts consider whether the case will be disrupted by the withdrawal of counsel"). Likewise, the remaining parties will not suffer any prejudice by the withdrawal because at this early stage of litigation, there will be no delay caused or costs incurred by the withdrawal since no discovery has been conducted, no depositions have been held, and there has not been an initial conference to set a discovery schedule. *Price v. Pub. Serv. Co. of Oklahoma*, No. 13-CV-514-GKF-FHM, 2016 WL 10570216, at \*2 (N.D. Okla. Jan. 21, 2016). The remaining parties and/or their respective counsel can immediately litigate this case without any impediment from outgoing counsel.

5. All clients have been notified of the undersigned's withdrawal as counsel from this matter.

WHEREFORE, James R. Marsh respectfully requests that the Court enter an Order granting him leave to withdraw from the above captioned case.

Dated: May 28, 2024

Respectfully submitted,

MARSH LAW FIRM PLLC

By: /s/ James R. Marsh

James R. Marsh

*Pro hac vice*

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**CERTIFICATE OF SERVICE**

I hereby certify that, on this 28<sup>th</sup> day of May 2024, the foregoing document was electronically filed with the Court's Electronic Filing System and will be served electronically on all registered parties and will be served via hard copy on all non-registered parties.

*/s/ James R. Marsh*  
James R. Marsh